

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**CO-LEAD CLASS COUNSEL'S MOTION TO (1) DIRECT CLAIMS
ADMINISTRATOR TO WITHHOLD ANY PORTIONS OF CLASS MEMBER
MONETARY AWARDS PURPORTEDLY OWED TO CERTAIN THIRD-PARTY
LENDERS AND CLAIMS SERVICES PROVIDERS, AND (2) DIRECT DISCLOSURE
TO THE CLAIMS ADMINISTRATOR OF EXISTENCE OF CLASS MEMBER
AGREEMENTS WITH ALL THIRD PARTIES**

Co-Lead Class Counsel respectfully moves the Court to enter an Order (1) directing the Claims Administrator to withhold any portions of Class Member monetary awards purportedly owed by Class Members to certain third-party lenders (including funders and so-called asset purchasers), and claims services providers; and (2) directing all individually-retained counsel and Class Members themselves, if they have not retained individual counsel, to disclose to the Claims

Administrator the existence of and terms of Class Member agreements with all third-party lenders and claims services providers. Such funds should be withheld following the Notice of Monetary Award Claim Determination for each Class Member for which such Notice is issued, pending further order of this Court as to the third parties' entitlement to such funds generally, or until such time as the third party in question shows cause to the Court or the Special Masters as to its entitlement to such funds.

The third parties as to which withholding is sought are the following:

Lenders

- Atlas Legal Funding, LLC¹
- Cambridge Capital Group, LLC²
- Cash4Cases, Inc.
- Global Financial Credit, LLC
- HMR Funding, LLC³
- Justice Funds/Justicefunds, LLC
- Ludus Capital, LLC
- Peachtree Funding Northeast, LLC/Settlement Funding, LLC⁴
- Pravati Legal Funding/ Pravati Capital, LLC
- RD Legal Funding, LLC⁵
- Thrivest Specialty Funding, LLC
- Top Notch Funding/Top Notch Lawsuit Loans/Top Notch Funding II, LLC
- Walker Preston Capital Holdings, LLC

¹ The related entities also included are Atlas Legal Funding I, L.P., and Atlas Legal Funding II, L.P.

² The related entities also included are Cambridge Capital Group Equity Option Opportunities, L.P., and Cambridge Capital Partners, L.P.

³ The related entities also included are HMRF Fund I, LLC and HMRF Fund II, LLC.

⁴ The related entities also included are Peachtree Settlement Funding, LLC, Peachtree Originations, LLC, Peachtree Financial Solutions, LLC, Peach Holdings, LLC, PeachHI, LLC, Orchard Acquisition Co. LLC, JGWPT Holdings, LLC, JGWPT Holdings, Inc., J.G. Wentworth, LLC, J.G. Wentworth S.S.C. Limited Partnership, J.G. Wentworth Structured Settlement Funding II, LLC, and Structures Receivables Finance #4, LLC.

⁵ The related entities also included are RD Legal Finance, LLC, and RD Legal Funding Partners, LP.

Claims Services Providers

- Case Strategies Group (formerly NFL Case Consulting, LLC)
- Legacy Pro Sports, LLC

The reasons supporting this Motion are set forth in the accompanying declaration and memorandum of law.

Dated: October 23, 2017

Respectfully submitted,

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Co-Lead Class Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing motion, along with the supporting documents, were served electronically via the Court's electronic filing system upon all counsel of record in this matter. True and correct copies of the foregoing motion and supporting documents were served upon the below counsel for the third parties addressed in this Motion or upon the third party itself, if counsel have not communicated previously with Class Counsel. Service is being made via Federal Express, overnight delivery and via email for those with whom Class Counsel previously have communicated via email.

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Dated: October 23, 2017

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